



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

April 6, 2005

Magalie R. Salas, Secretary  
Federal Energy Regulatory Commission  
888 First St., N.E. Room 1A  
Washington, DC 20426

**Docket Nos: CP05-13-000, CP05-11-000, CP05-12-000, CP05-14-000**

Dear Ms. Salas:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality Regulations (CEQ) for Implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Impact Statement (DEIS) for the Ingleside Energy Center and Liquefied Natural Gas (LNG) Terminal and Pipeline Project, Nueces and San Patricio Counties, Texas. This facility would have a nominal output of about 1.0 billion cubic feet of imported natural gas per day to the U.S. Market.

The following comment is being provided for your consideration in preparation of the Final EIS (FEIS):

In addition to the analysis regarding the ballast water exchange procedures as they might relate to invasive species, EPA asks for a similar discussion of the potential for invasive species introduction via other pathways, such as by organisms which might travel affixed to or onboard the LNG vessels or associated with any materials exchanged at the port. The statement is made that: "... the local biotic community is likely adapted to a regular influx of exogenous organisms." We see two problems with this statement. First, it presumes that specific ecological adaptations are at work but those adaptations are left undocumented in the text. Second, although a direct response to the concern was prepared, this statement seems to dismiss the issue as a valid concern. As you know, it is the one exotic species that takes off (i.e., becomes invasive) that can severely impact an ecosystem. Please provide additional discussion on this matter in the FEIS.

EPA classified your DEIS and proposed action as "LO," i.e., EPA has "Lack of Objections" to the proposed alternative. Our classification will be published in the Federal Register according to our responsibility under Section 309 of the Clean Air Act, to inform the public of our views on proposed Federal actions.

EPA appreciates the opportunity to review the DEIS. We request that you send our office one (1) copy of the FEIS at the same time that it is sent to the Office of Federal Activities (2251A), EPA, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20044.

Sincerely yours,

/S/

Bonnie Braganza  
Acting Chief  
Office of Planning and  
Coordination 6ENXP